

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 24-cv-4775 (ER)

JANE DOE 200,

Plaintiff,

vs.

DARREN K. INDYKE AND RICHARD
D. KAHN AS CO-EXECUTORS OF
THE ESTATE OF JEFFREY E. EPSTEIN,

Defendant.

/

PLAINTIFF, JANE DOE 200'S, NOTICE OF INTENT TO SERVE SUBPOENA
UPON THIRD PARTY DARREN K. INDYKE

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure, the Plaintiff, Jane Doe 200, by and through her undersigned counsel of record, intends to serve a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (“Subpoena”) upon third party, Darren K. Indyke. A copy of the Subpoena is attached hereto as Exhibit A.

Dated: February 25, 2025

Respectfully Submitted,
EDWARDS HENDERSON, PLLC
By: /s/ Bradley J. Edwards
Bradley J. Edwards
Brittany N. Henderson
425 N. Andrews Ave., Suite 2
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(954)-524-2820
Fax: (954)-524-2822
Email: brad@cvlf.com
brittany@cvlf.com

CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2025, a true and correct copy of the above and foregoing *Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action* ("Subpoena") has been served by email upon counsel of record in the above-captioned action.

/s/ Bradley Edwards
Bradley J. Edwards

Bennet J. Moskowitz
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*Attorneys for Defendant Darren K. Indyke,
in his capacity as the Executor for the
Estate of Jeffrey E. Epstein*

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*Attorneys for Defendant Richard D. Kahn,
in his capacity as the Executor for the
Estate of Jeffrey E. Epstein*

EXHIBIT

A

UNITED STATES DISTRICT COURT
for the
Southern District of New York

Jane Doe 200

Plaintiff

v.

Darren K. Indyke and Richard D. Kahn, et. al.

Defendant

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)
)
)

Civil Action No. 24-cv-4775 (ER)

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

Darren K. Indyke

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Schedule A attached.

Place: Edwards Henderson 425 North Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301	Date and Time: 03/19/2025 3:00 pm
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Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/25/2025

CLERK OF COURT

OR

/s/ Bradley J. Edwards

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) Plaintiff
Jane Doe 200, who issues or requests this subpoena, are:

Bradley J. Edwards, 425 N. Andrews Ave., #2, Ft. Lauderdale, FL 33301, brad@cvlf.com, brittany@cvlf.com,
954-524-2820

Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 24-cv-4775 (ER)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (*name of individual and title, if any*) _____
on (*date*) _____.

I served the subpoena by delivering a copy to the named person as follows: _____

on (*date*) _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____
Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

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SOUTHERN DISTRICT OF NEW YORK

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DARREN K. INDYKE AND RICHARD
D. KAHN AS CO-EXECUTORS OF
THE ESTATE OF JEFFREY E. EPSTEIN,

Defendant.

/

**SCHEDULE A TO SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION
DIRECTED TO DARREN INDYKE**

1. All emails or other correspondence sent by you or anyone in your office, Darren K. Indyke PLLC, related to Jane Doe 200.
2. All emails or correspondence received by you or anyone in your office, Darren K. Indyke PLLC, related to Jane Doe 200.
3. All documents or communications exchanged between You and Jeffrey Epstein discussing claims of sexual assault, rape, and/or concealment of the same.
4. All documents or communications exchanged between You and Lesley Groff discussing claims of sexual assault by Jeffrey Epstein and/or concealment of the same.
5. All documents or communications exchanged between You and Bella Klein discussing claims of sexual assault by Jeffrey Epstein and/or concealment of the same.
6. All documents or communications exchanged between You and Richard Khan discussing claims of sexual assault by Jeffrey Epstein and/or concealment of the same.
7. All documents or communications exchanged between You and Richard Khan discussing allegations of sexual abuse by Jeffrey Epstein.

8. All documents or communications exchanged between You and Richard Khan discussing the settlement of any sexual abuse claims against Jeffrey Epstein or the Estate of Jeffrey Epstein.
9. All documents or communications evidencing payments made to You by the Estate of Jeffrey Epstein.
10. All documents or communications evidencing the beneficiaries of Jeffrey Epstein's 1953 Trust.
11. All documents or communications identifying You as a beneficiary of Jeffrey Epstein's Estate.